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Management LLC and Kyle Samani*

[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

MARK YOUNG, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

SOLANA LABS, INC.;
THE SOLANA FOUNDATION;
ANATOLY YAKOVENKO; MULTICOIN
CAPITAL MANAGEMENT LLC; KYLE
SAMANI,

Defendants.

Case No. 3:22-cv-03912-RFL

**JOINT STIPULATION AND [PROPOSED]
ORDER RE UNOPPOSED
ADMINISTRATIVE MOTION TO
EXTEND PAGE LIMITS**

Judge: Hon. Rita F. Lin

Pursuant to Civil Local Rules 7-11 and 7-12, and the Court's Standing Order, Lead Plaintiff Mark Young ("Plaintiff"), Defendants Solana Labs, Inc. ("Solana Labs"), Multicoin Capital Management LLC ("Multicoin") and Kyle Samani ("Samani") (together with Solana Labs and Multicoin, "Defendants", and collectively with Plaintiff, the "Parties"), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, on January 12, 2024, Plaintiff filed his Consolidated Amended Class Action Complaint ("Amended Complaint") (Dkt. 68);

WHEREAS, pursuant to the Court's February 13, 2024 Order, the last day for Defendants to file their respective responses to the Amended Complaint is April 11, 2024, Plaintiff's last day to respond to the anticipated motion(s) to dismiss is May 13, 2024, and Defendants' last day to file replies in support of their anticipated motions to dismiss is June 12, 2024 (Dkt. 71);

WHEREAS, the Parties have conferred and, given the complexity of the issues to be briefed and the number of factual allegations involved, agreed that: (1) Defendants Multicoin and Samani shall be permitted a five (5) page increase in the page limits set forth by the Court's Standing Order, such that defendants Multicoin and Kyle Samani shall be permitted to file a joint brief in support of their motion to dismiss of up to twenty (20) pages; (2) Defendant Solana Labs shall be permitted a five (5) page increase in the page limits set forth by the Court's Standing Order, such that defendant Solana Labs shall be permitted to file a brief in support of its motion to dismiss of up to twenty (20) pages; and (3) Plaintiff Mark Young shall be permitted to file a five (5) page increase in the page limits set forth by the Court's Standing Order, such that Plaintiff Mark Young shall be permitted to file briefs in support of his opposition to Defendants' motions to dismiss of up to twenty (20) pages each;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by counsel for the Parties listed below, that:

1. Defendants Multicoin and Samani shall be permitted to file a brief of up to twenty (20) pages in support of their joint motion to dismiss the Amended Complaint.
2. Defendant Solana Labs shall be permitted to file a brief of up to twenty (20) pages in support of their motion to dismiss the Amended Complaint.

3. Plaintiff Mark Young shall be permitted to file briefs of up to twenty (20) pages each in support of his opposition to the Defendants' motions to dismiss the Amended Complaint.

DATED: April 3, 2024

SCHNEIDER WALLACE COTTRELL
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By: /s/ Matthew S. Weiler

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DATED: April 3, 2024

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Attorneys for Defendant Solana Labs, Inc.

1 DATED: April 3, 2024

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11 *Attorneys for Defendants Multicoin Capital*
12 *Management LLC and Kyle Samani*

WAYMAKER

1 PURSUANT TO STIPULATION, IT IS SO ORDERED

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3 DATED: April 3, 2024

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Hon. Rita F. Lin
United States District Court Judge

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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Joint Stipulation and [Proposed] Order Regarding Unopposed Administrative Motion to Extend Page Limits. Pursuant to L.R 5-1(h)(3) regarding signatures, I, Kevin M. Casey, attest that concurrence in the filing of this document has been obtained.

DATED: April 2, 2024

Kevin M. Casey